



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL NO. 2:23cr20
)
ISAIAH J. CARD,)
)
Defendant.)

STATEMENT OF FACTS

By signing below, the parties stipulate that the allegations in the pending criminal indictment and criminal information and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. On October 24, 2022, in Chesapeake, Virginia, in the Eastern District of Virginia, a U.S. Postal Service Letter Carrier was accosted by an unknown assailant wearing a hoodie. The assailant grabbed the U.S. Postal key from the letter carrier's hand and ripped the chain off the letter carrier's pants, tearing the belt loop of the letter carrier's waistband. As the assailant fled, the letter carrier witnessed him holding a handgun in the rear of his pants.

2. A U.S. Postal key is a large key with an engraved symbol on the front along with a serial number which is issued in a series which corresponds with specific zip codes. Each series of keys is capable of opening various types of mail receptacles in their specific areas including blue collection boxes and apartment panel mailboxes. The stolen key corresponded to postal boxes in Chesapeake, Virginia.

3. On the evening of October 25, 2022, at the Indian River Post Office in Chesapeake, Virginia, two individuals wearing hoodie sweatshirts were seen using a U.S. Postal key to access

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the three boxes and remove the mail contents and place them into a bookbag. Two individuals wearing the same clothing and matching the prior description of the October 25, 2022, break in were also seen breaking into the Indian River Post Office blue collection boxes on November 4th, 18th, 27th, and December 3rd, 10th, 12th, 14th, and 15th of 2022.

4. The thieves were targeting mailboxes to steal checks and other financial instruments. Specifically, the thieves would open the mail and find checks that victims had written to pay bills such as mortgage loan, auto loan, or other payments. The thieves would take these checks and “wash” them, that is, they would use various chemicals to remove the person or organization on the check’s payee line. They would then write in their name or that of a co-conspirator and use mobile banking apps to deposit the checks into their accounts.

5. The Postal Inspection Service received complaints from numerous customers who had stolen checks negotiated in this manner by unknown individuals after having placed their mail in blue collection boxes at other Chesapeake Post Offices like Chesapeake Main and the Great Bridge Post Office.

6. On December 18, 2022, Postal Inspectors along with the Chesapeake, Virginia Police Department conducted surveillance at the Chesapeake Main Post Office. At approximately 11:37 P.M., a black, 4 door Lexus pulled up and two occupants exited the vehicle with hoods on. The driver remained in the vehicle. Postal Inspectors witnessed the two hooded individuals walk westbound in the parking lot and then north to the blue collection boxes.

7. Postal Inspectors watched the collection boxes firsthand as well as through covert video cameras as the two suspects used a Postal key to unlock the boxes and remove the contents

and place them in a bag. The two suspects were then observed running back to the black Lexus. Postal Inspectors began to move in to block the vehicle in as the two suspects arrived at the side of the black Lexus. As Postal Inspectors activated their emergency police lights, the two suspects took off on foot. Postal Inspectors concentrated on safely detaining the driver of the Lexus and Chesapeake Police Officers chased the fleeing suspects. The driver of the Lexus was determined to be ISAIAH J. CARD. The suspects abandoned the large bag filled with mail which included approximately 250 pieces of stolen mail.

8. Chesapeake Police Officers were able to locate one of the two suspects who fled on foot. He was identified as DAHNICO JHARON MCCOY. Officers also found discarded clothing along the path that MCCOY fled which included the same black jacket with distinct writing on the back seen in at least five prior collection box break-ins.

9. A search of the Lexus revealed numerous stolen checks and Western Union Money Orders that had been stolen from previous mail heists. Some of these Western Union money orders had been "washed" and made out in the name of ISAIAH J. CARD. These forged Money Orders in the name of CARD contained the names and account numbers of various victims who had their mail stolen and would have been negotiated in furtherance of a scheme to defraud and to obtain money under the custody and control of Western Union, a Federal Deposit Insurance Corporation (FDIC) federally insured financial institution.

10. In forging and negotiating items from the stolen mail, CARD and MCCOY knowingly possessed and used, without lawful authority, means of identifications of other people. This was done during and in relation to a conspiracy to commit bank fraud, in violation of 18 U.S.C. §§ 1344 and 1349.

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11. On April 19, 2023, CARD and MCCOY traveled to Raleigh, North Carolina, in the Eastern District of North Carolina, and robbed a mail carrier for her postal key while possessing a firearm and in furtherance of the robbery. CARD and MCCOY approached the mail carrier while she was delivering mail to a cluster of mailboxes at an apartment complex. They stole the key and fled after MCCOY made a motion indicating to the mail carrier that he possessed a firearm. On April 20, 2023, a number of postal boxes in the Raleigh area were robbed using the stolen postal key. On April 27, 2023, after investigation developed CARD and MCCOY as the primary suspects, a traffic stop was conducted on their vehicle and CARD and MCCOY were arrested. A lawful search of their vehicle revealed the stolen postal key, a handgun, and at least 180 stolen checks, some of which had already been washed. A robbery by putting the life in jeopardy, through the use of a dangerous weapon, of any person having lawful charge, control, or custody of any mail matter or of any money or other property of the United States is considered to be a crime of violence for purposes of 18 U.S.C. § 924(c). *United States v. Bryant*, 949 F.3d 168 (4th Cir. 2020).

12. The acts taken by the defendant, ISAIAH J. CARD, in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case nor does it identify all of the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By:

Joseph L. Kosky
Assistant United States Attorney

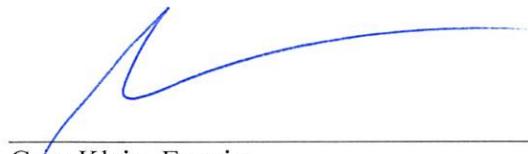


After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ISAIAH J. CARD, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



ISAIAH J. CARD
Defendant

I am Greg Klein, ISAIAH J. CARD's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Greg Klein, Esquire
Attorney for ISAIAH J. CARD